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January 27, 2023

VIA ELECTRONIC MAIL

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**RE Petro Industrial Solutions, LLC v. Island Project and Operating Services, LLC,
VITOL Holding Co., VITOL VI and Andrew Canning
Case No.: SX-2021-CV-00700**

Dear Counsel:

Pursuant to paragraph 2 of the Court's First Amended Scheduling Order (Doc. No. 136), Island Project and Operating Services LLC ("IPOS") provides notice that it intends to conduct the following depositions pursuant to the proposed schedule set forth below, or as otherwise agreed to pursuant to a meet and confer between the parties. IPOS reserves the ability to issue a notice or cross notice of deposition of any witness identified in the communication of any other party served pursuant to the Order, as well as the ability to amend or supplement this list based upon additional discovery or further investigation.



All Counsel of Record
 January 27, 2023
 Page 2

Deponent Name	Proposed Dates for Deposition
Adrian Melendez, Jr.	February 13-16 March 2 March 6 April 3 April 4 starting at 12:00 AST
30(b)(6) Deposition of Petro Industrial Solutions, LLC	February 13-16 March 2 March 6 April 3 April 5 April 17-19 April 21
Chetram “Chad” Persaud	February 13-16 March 2 March 6 March 27-29 April 3 April 4 starting at 12:00 AST April 5 April 17-19 April 21
30(b)(6) of Acuren Inspection Services and/or individuals affiliated with Acuren Inspection Services to be determined	May 22-26
30(b)(6) Versa Integrity Group and/or individuals affiliated with Versa Integrity Group to be determined	Tentatively May 22-26

For scheduling purposes, please be advised that I am unavailable on the following dates identified in Attorney Rohn’s letter dated January 25, 2023

Proposed Dates	Notation
March 20-March 23, 2023	Trial
April 6	Reserved for meeting from noon to 2 p.m.
May 25, 2023 through 12 noon (available starting at/after 12 noon)	
May 30-31	Final pre-trial meetings and conferences/hearings
June 1-2	Final pre-trial meetings and conferences/hearings
June 5-9	Trial

All Counsel of Record
January 27, 2023
Page 3

June 12-13	Trial
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I am available on February 1 and February 3 to meet and confer about a schedule for any depositions that have been identified by Plaintiff which are not also identified by IPOS or another defendant.

Sincerely,

Simone R.D. Francis

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SRDF:s